

Exhibit A

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CARBONLITE HOLDINGS LLC, *et al.*,¹

Debtors.

BAHRAM NOUR-OMID, an individual, and
LEARNICON LLC, a Delaware limited
liability company,

Plaintiffs,

v.

CARBONLITE HOLDINGS LLC, a
Delaware limited liability company, LF
INVESTMENT HOLDINGS, LLC, a
Delaware limited liability company, LEON
FARAHNIK, an individual, KIM JEFFERY,
an individual, FARAMARZ
YOUSSEFZADEH, an individual, ORION
ENERGY CREDIT OPPORTUNITIES
FUND II, L.P., a Delaware limited
partnership, ORION ENERGY CREDIT
OPPORTUNITIES FUND II PV, L.P., a
Delaware limited partnership, ORION
ENERGY CREDIT OPPORTUNITIES
FUND II GPFA, L.P., a Delaware limited
partnership, FORCE TEN PARTNERS, LLC,
a Delaware limited liability company, BRIAN
WEISS, an individual, and DOES 1 through
50, inclusive,

Defendants.

Chapter 11

Case No. 21-10527 (JTD)

(Jointly Administered)

Adv. Proc. No. 21-50317 (JTD)

STIPULATION EXTENDING BRIEFING SCHEDULE

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: CarbonLite Holdings LLC (8957); CarbonLite Industries LLC (3596); CarbonLite P Holdings, LLC (8957); CarbonLite P, LLC (5453); CarbonLite PI Holdings, LLC (8957); CarbonLite Pinnpack, LLC (8957); CarbonLite Recycling Holdings LLC (8957); CarbonLite Recycling LLC (3727); CarbonLite Sub-Holdings, LLC (8957); Pinnpack P, LLC (8322); and Pinnpack Packaging, LLC (9948). The address of the Debtors' corporate headquarters is 10250 Constellation Blvd., Los Angeles, CA 90067.

This stipulation (the “Stipulation”) is entered into by and among plaintiffs Bahram Nour-Omid and Learnicon LLC (collectively, “Plaintiffs”) and defendants Orion Energy Credit Opportunities Fund II, L.P., Orion Energy Credit Opportunities Fund II PV, L.P. and Orion Energy Credit Opportunities Fund II GPFA, L.P. (collectively, the “Orion Funds” and, together with Plaintiffs, the “Parties”), by and through their undersigned counsel.

WHEREAS, on April 12, 2021, Plaintiffs commenced the above captioned adversary proceeding (the “Adversary Proceeding”) by filing their *Complaint* [Adv. D.I. 1] (the “Complaint”) against, among other parties, the Orion Funds;

WHEREAS, on May 21, 2021, the Orion Funds filed *Orion Energy Credit Opportunities Fund II, L.P., Orion Energy Credit Opportunities Fund II PV, L.P. and Orion Energy Credit Opportunities Fund II GPFA, L.P.’s Motion to Dismiss the Complaint* [Adv. D.I. 5-7] (the “Motion”);

WHEREAS, the current deadline by which Plaintiffs need to file their response to the Motion is June 4, 2021; and

WHEREAS, the Parties have conferred with respect to seeking an extension of the briefing schedule concerning the Motion.

NOW, THEREFORE, SUBJECT TO APPROVAL OF THE COURT, IT IS HEREBY STIPULATED AND AGREED THAT:

1. The time for Plaintiffs to file and serve their response to the Motion shall be extended until and including June 9, 2021.
2. The Orion Funds’ reply in support of the Motion, if any, shall be filed and served no later than June 21, 2021.

[Signature Page Follows]

Dated: June 3, 2021

BARNES & THORNBURG LLP

/s/ Kevin G. Collins

Thomas E. Hanson, Jr. (DE No. 4102)
Kevin G. Collins (DE No. 5149)
1000 N. West Street, Suite 1500
Wilmington, DE 19801
Telephone: (302) 300-3447
Facsimile: (302) 300-3456
Email: thanson@btlaw.com
kevin.collins@btlaw.com

-and-

Sanford L. Michelman (Cal. Bar No. 179702)
Mona Z. Hanna (Cal. Bar No. 131439)
Howard I. Camhi (Cal. Bar No. 149194)
Alexander R. Safyan (Cal. Bar No. 277856)
MICHELMAN & ROBINSON, LLP
10880 Wilshire Blvd., 19th Floor
Los Angeles, CA 90024
Telephone: (310) 299-5500
Facsimile: (310) 299-5600
Email: smichelman@mrlp.com
mhanna@mrlp.com
hcamhi@mrlp.com
asafyan@mrlp.com

*Counsel for Plaintiffs Bahram Nour-Omid
and Learnicon LLC*

YOUNG CONAWAY STARGATT &
TAYLOR LLP

/s/ Kara Hammond Coyle

Robert S. Brady (DE No. 2847)
Edwin J. Harron (DE No. 3396)
Kara Hammond Coyle (DE No. 4410)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Email: rbrady@ycst.com
eharron@ycst.com
kcoyle@ycst.com

-and-

Eric Leon
Mateo de la Torre
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10022
Email: eric.leon@lw.com
mateo.delatorre@lw.com

*Counsel for Defendants Orion Energy Credit
Opportunities Fund II, L.P., Orion Energy
Credit Opportunities Fund II PV, L.P., and
Orion Energy Credit Opportunities Fund II
GPFA, L.P.*